

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF ORANGEBURG	)	CIVIL ACTION No.: 2022-CP-38-_____
	)	
Natalie Thompson,	)	
	)	
<i>Plaintiff,</i>	)	<b>SUMMONS</b>
	)	<b>(Jury Trial Demanded)</b>
vs.	)	
	)	
Rolfand R. Sanchez-Salas and Melton Truck	)	
Lines, Inc.,	)	
	)	
<i>Defendants.</i>	)	

**TO: THE ABOVE NAMED DEFENDANTS:**

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer to said Complaint on the subscribers at their office located at 1325 St. Matthews Road, Orangeburg, South Carolina 29115, within thirty (30) days after the service hereof; exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for relief demanded in this Complaint, and a judgment by default will be rendered against you for the relief demanded in this Complaint.

**LANIER & BURROUGHS, LLC**

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**ATTORNEYS FOR PLAINTIFF**

June 27, 2022

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF ORANGEBURG	)	CIVIL ACTION No.: 2022-CP-38-_____
	)	
Natalie Thompson,	)	
	)	
<i>Plaintiff,</i>	)	<b>COMPLAINT</b>
	)	<b>(Jury Trial Demanded)</b>
vs.	)	
	)	
Rolfand R. Sanchez-Salas and Melton Truck	)	
Lines, Inc.,	)	
<i>Defendants.</i>	)	

Now comes the Plaintiff complaining of the Defendants herein who would allege and state as follows:

1. That the Plaintiff Natalie Thompson ("Plaintiff") is a citizen and resident of Orangeburg County, South Carolina.
2. That upon information and belief, Defendant Rolfand R. Sanchez-Salas (hereinafter "Defendant Sanchez-Salas ") is, and was at all relevant times herein, a citizen of one of the counties in the State of Nevada.
3. That upon information and belief, Defendant Melton Truck Lines, Inc., (hereinafter "Defendant Melton Truck Lines" is, and was at all relevant times herein, a corporation organized and existing under the laws of the State of Oklahoma, with its principal place of business in Tulsa, Oklahoma. Defendant Melton Truck Lines conducts business through South Carolina, including Orangeburg County.
4. That at all times relevant hereto, Defendant Sanchez-Salas was acting as an agent, servant or employee of Defendant Melton Truck Lines, and was acting within the course and scope

of his agency, service, or employment so as to make Defendant Melton Truck Lines liable for the acts or omissions of Defendant Sanchez-Salas under the theory of *Respondent Superior*.

5. That this Court has jurisdiction over this matter and venue is proper.

6. That on or about July 3, 2019, within the County of Orangeburg, Defendant Sanchez-Salas, while operating a 2018 Kenworth tractor trailer owned by Defendant Melton Truck Lines in the course and scope of his employment for Defendant Melton Truck Lines, carelessly, negligently, and recklessly collided with a vehicle driven by the Plaintiff, in a restricted area which specifically prohibited truck traffic.

7. That as a direct and proximate result of the Defendants' negligent, careless, reckless, grossly negligent, willful and wanton conduct described above, Plaintiff sustained property damages and personal injuries; she has been forced to incur doctor and medical bills, she has been forced much mental anguish and physical pain, she has been caused to lose enjoyment of life, and that her injuries are permanent in nature and, pursuant to S.C. Code § 19-1-150, she will continue to incur damages into the future, all such damages in an amount to be determined by the trier of fact.

**FOR A FIRST CAUSE OF ACTION**  
**AS TO ALL DEFENDANTS**  
**(Negligence)**

8. That the Plaintiff re-alleges and reiterates the allegations set forth in Paragraphs 1 through 7, as if set out herein verbatim.

9. That the aforementioned damage to the Plaintiff was a direct and proximate result of the negligent, careless, reckless, grossly negligent, willful and wanton conduct of Defendant Melton Truck Lines, independently and by and through the acts and/or omissions of their agents, servants and/or employees, including Defendant Sanchez-Salas, at the time and place above-mentioned, in the following particulars, to wit:

- a) In failing to maintain proper control of the vehicle;
- b) In failing to operate the vehicle in a safe and reasonable manner;
- c) In operating the vehicle in an unlawful and reckless manner;
- d) In making an improper or unlawful turn;
- e) In failing to maintain proper attention;
- f) In operating the vehicle while fatigued;
- g) In failing to take evasive action to avoid the collision;
- h) In failing to properly observe the road and traffic conditions;
- i) In operating his vehicle in utter disregard for the safety of others on the highway;
- j) In failing to obey the traffic laws;
- k) In failing to enforce and abide by the rules and regulations regarding the operation of motor vehicles, including, but not limited to federal and state law and regulations;
- l) In negligently hiring and training its employees;
- m) In failing to properly train, monitor, or supervise the operators of its vehicles;
- n) In negligently retaining drivers who have shown a proclivity for operating a commercial vehicle carelessly;
- o) In failing to institute, maintain and/or enforce proper policies and procedures to ensure that its employees execute their responsibilities in a reasonable fashion to protect innocent citizens such as Plaintiff;
- p) In failing to ensure that its employees follow proper policies and procedures in the performance of their work and execute their responsibilities in a reasonable fashion to protect innocent citizens such as Plaintiff;
- q) In failing to enforce or abide by good practices, industry standards, or applicable rules and regulations;
- r) In failing to exercise the degree of care that a reasonably prudent person or company would have exercised under the same or similar circumstances; and
- s) In such other and further particulars that the evidence in trial may show;



All of which combined and concurred as a direct and proximate cause of the injuries and damages sustained by Plaintiff herein, said acts being in violation of the statutes and laws of the State of South Carolina.

10. That as a direct and proximate result of the Defendants' negligent, careless, reckless, grossly negligent, willful and wanton conduct described above, Plaintiff sustained property damages and personal injuries; she has been forced to incur doctor and medical bills, she has been forced much mental anguish and physical pain, she has been caused to lose enjoyment of life, and that her injuries are permanent in nature and, pursuant to S.C. Code § 19-1-150, she will continue to incur damages into the future, all such damages in an amount to be determined by the trier of fact.

**FOR A THIRD CAUSE OF ACTION**  
**(Negligent Entrustment)**

11. That the Plaintiff re-alleges and reiterates the allegations set forth in Paragraphs 1 through 10, as if set out verbatim herein.

12. That Defendant Melton Truck Lines, at the time of the events described herein, had or should have had constructive knowledge of Defendant Sanchez-Salas' prior history of careless and reckless driving habits, delivery methods, and equipment operation.

13. That despite this knowledge and under these circumstances, Defendant Melton Truck Lines entrusted the commercial vehicle and equipment to Defendant Sanchez-Salas at the time of the events described herein.

14. That Defendant Melton Truck Lines, is liable to Plaintiff for her injuries and damages due to Defendants' negligent, grossly negligent, reckless, willful and wanton entrustment of the truck and equipment to Defendant Sanchez-Salas.

15. That as a direct and proximate result of this negligent, careless, reckless, grossly

negligent, willful and wanton entrustment of the truck and equipment to Defendant Sanchez-Salas, Plaintiff was injured in the following particulars: she was caused to suffer personal injuries, she has been forced to incur doctor and medical bills, she has been forced much mental anguish and physical pain, she has been caused to lose enjoyment of life, and that her injuries are permanent in nature and pursuant to Section 19-1-150 of the Code of Laws of the State of South Carolina, she will continue to incur damages into the future, all to the Plaintiff's damages in an amount to be determined by the trier of fact.

**WHEREFORE**, the Plaintiff prays for judgment against the Defendants for actual damages and for punitive damages as may be determined by the trier of fact, the cost of this action, and for such other and further relief as this Court may deem just and proper.

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